

"Keeping you in touch with your hometown and beyond!"

Alice Evitt Bandy President

Phil Erfi Executive Vice President

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

EB Docket No. 06-36

Re: Certification of CPNI Compliance Filing- February 7, 2011

Ringgold Telephone Company Ringgold Telephone Long Distance 499 Filer 1D # 806097 499 Filer ID # 823628 499 Filer ID # 827605

RTC Solutions, Inc.

Dear Ms. Dortch:

The telecommunications carriers listed above are filing the attached CPNI Certification together with the statement of procedures for operational compliance with the FCC's CPNI rules.

Sincerely.

11 Salli Regulatory Manager

Attachment



"Keeping you in touch with your hometown and beyond!" Alice Evitt Bandy President

Phil Erli Executive Vice President

ATTACHMENT

CERTIFICATE OF COMPLIANCE

Company Names: Ringgold Telephone Company, Ringgold Telephone Long Distance and RTC Solutions. Inc.

Address: 6203 Alabama Hwy

P.O. Box 869

Ringgold, GA 30736

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

Title: Executive Vice President

Date: 2/7/2011

RINGGOLD TELEPHONE COMPANY

P. O. Box 869 Ringgold, GA 30736 706-965-2345

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date signed: February 7, 2011

Names of Companies Covered by this Certification:	499 Filer ID
Ringgold Telephone Company	806097
Ringgold Telephone Long Distance, Inc.	823628
RTC Solutions, Inc.	827605

Name of signatory: Phil Erli

Title of signatory: Executive Vice President

I, Phil Erli, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has nothing to report respecting processes pretexters use in attempts to gain access to CPNI. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and thus has nothing to report respecting customer complaints concerning unauthorized access to CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

Attachment

RINGGOLD TELEPHONE COMPANY

Ringgold Telephone Company, Inc. 499 Filer ID 806097 Ringgold Telephone Long Distance, Inc. 499 Filer ID 823628 RTC Solutions, Inc. 499 Filer ID Pending

P. O. Box 869 Ringgold, GA 30736 706-965-2345

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE February 7, 2010

This statement accompanies the Company's 2010 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 et seq.

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the optin approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with Section 64.2010 including, but not limited to the following:*

authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits;

implementation of procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

*The Company does not provide customers with on-line access to customer account information.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

No actions taken against data-brokers.

No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.